

# Russell City Energy Company, LLC

717 Texas Avenue  
Suite 1000  
Houston, TX 77002

July 26, 2018

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105-2097  
Attn: Title V Reports

RECEIVED

JUL 26 2018

Bay Area Air Quality  
Management District

Re: Russell City Energy Company, LLC  
Title V CEMS Semi-Annual Monitoring Report  
Facility No. B8136  
Reporting Period: January 1, 2018 – June 30, 2018

To Whom It May Concern:

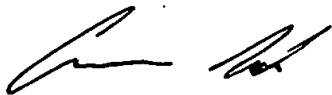
Enclosed is the Title V CEMS Semi-Annual Compliance Monitoring Report for the Russell City Energy Center (RCEC).

RCEC is currently in compliance with the District CEMS regulations. RCEC maintained compliance with the monitoring requirements listed in the Title V permit for RCEC during this reporting period.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

If you have any questions or require additional information, please contact Lauren Bresnahan, EHS Specialist III, at (510) 731-1407.

Sincerely,



Cameron White  
Plant Manager and  
Designated Representative/ Responsible Official  
Russell City Energy Company, LLC

**Title V CEMS Semi-Annual Monitoring Report**

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 1 of 17

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1, S-3 GAS TURBINE**  
**S-2, S-4 HEAT RECOVERY STEAM GENERATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NO <sub>x</sub>	BAAQMD 9-3-303	N		125 ppm	BAAQMD 1-520.1	C	CEM	X	
NO <sub>x</sub>	BAAQMD 9-9-301.1.3	Y		9 ppmv @ 15% O <sub>2</sub> , dry	BAAQMD 9-9-501	C	CEM	X	
NO <sub>x</sub>	BAAQMD 9-9-301.2	N		0.15 lb/MW-hr or 5 ppmv	BAAQMD 9-9-501	C	CEM	X	
NO <sub>x</sub>	SIP 9-9-301.3	Y		9 ppmv @ 15% O <sub>2</sub> , dry	BAAQMD 9-9-501	C	CEM	X	
NO <sub>x</sub>	40 CFR 60 Subpart KKKK 60.4320(a) Table 1	Y		15 ppm at 15% O <sub>2</sub> or 0.43 lb/MW-hr	40 CFR 60 Subpart KKKK 60.4340(b)(1)	C	CEM	X	
NO <sub>x</sub>		Y		None	40 CFR 75.10	C	CEM	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	CEM	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 2 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NOx	BAAQMD condition #23763, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	X	
NOx	BAAQMD condition #23763, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
NOx	Federal PSD Permit condition #26117, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	CEM	X	
NOx	Federal PSD Permit condition #26117, part 19a	Y		0.00735 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	
NOx	BAAQMD condition #23763, part 19b	Y		2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 19b	Y		2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 3 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 19b	Y		2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	CEM	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 19b	Y		2.0 ppmv, @ 15% O <sub>2</sub> , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 20	Y		95 lb/turbine during hot start-up	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 20	Y		95 lb/turbine during hot start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 20	Y		40 lb/turbine during shutdown	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 20	Y		40 lb/turbine during shutdown	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 20	Y		480 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 20	Y		480 lb/turbine during cold start-up or combustor tuning operation	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 4 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NO <sub>x</sub>	BAAQMD condition #23763, part 20	Y		125 lb/turbine during warm start-up	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 20	Y		125 lb/turbine during warm start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 22a	Y		1,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning	BAAQMD condition #23763, part 26	C	CEM	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 22a	Y		1,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning	Federal PSD Permit condition #26117, part 26	C	CEM	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 22b	Y		1225 lb/day for turbines, HRSGs, and fire pump diesel engine, combined during ozone season from June 1 through September 30	BAAQMD condition #23763, part 26	C	CEM	X	
NO <sub>x</sub>	BAAQMD condition #23763, part 23a	Y		127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 26	C	CEM	X	
NO <sub>x</sub>	Federal PSD Permit condition #26117, part 23a	Y		127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)	Federal PSD Permit condition #26117, part 26	C	CEM	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 5 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
CO	BAAQMD condition #23763, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	X	
CO	BAAQMD condition #23763, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum and minimum load	X	
CO	Federal PSD Permit condition #26117, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	CEM	X	
CO	Federal PSD Permit condition #26117, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	X	
CO	BAAQMD condition #23763, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	X	
CO	BAAQMD condition #23763, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum and minimum load	X	
CO	Federal PSD Permit condition #26117, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	CEM	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 6 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
CO	Federal PSD Permit condition #26117, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	X	
CO	BAAQMD condition #23763, part 19d	Y		2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	X	
CO	BAAQMD condition #23763, part 19d	Y		2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #13763, part 30	P/A	Source test at maximum and minimum load	X	
CO	Federal PSD Permit condition #26117, part 19d	Y		2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	CEM	X	
CO	Federal PSD Permit condition #26117, part 19d	Y		2.0 ppmv, dry, @ 15% O <sub>2</sub> , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	X	
CO	BAAQMD condition #23763, part 20	Y		891 lb/turbine during hot start-up	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
CO	Federal PSD Permit condition #26117, part 20	Y		891 lb/turbine during hot start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 7 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
CO	BAAQMD condition #23763, part 20	Y		2,514 lb/turbine during warm start-up	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
CO	Federal PSD Permit condition #26117, part 20	Y		2,514 lb/turbine during warm start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
CO	BAAQMD condition #23763, part 20	Y		100 lb/turbine during shutdown	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
CO	Federal PSD Permit condition #26117, part 20	Y		100 lb/turbine during shutdown	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
CO	BAAQMD condition #23763, part 20	Y		2,514 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 26	P/D	Records, calculations	X	
CO	Federal PSD Permit condition #26117, part 20	Y		2,514 lb/turbine during cold start-up or combustor tuning operation	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
CO	BAAQMD condition #23763, part 22c	Y		7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 26b	C	CEM	X	
CO	Federal PSD Permit condition #26117, part 22c	Y		7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined	Federal PSD Permit condition #26117, part 26b	C	CEM	X	
CO	BAAQMD condition #23763, part 23b	Y		330 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 26b	C	CEM	X	



# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 8 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
CO	Federal PSD Permit condition #26117, part 23b	Y		330 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	Federal PSD Permit condition #26117, part 26b	C	CEM	X	
CO <sub>2</sub>		Y		None	40 CFR 75.10	C	fuel flow monitor and CO <sub>2</sub> calculation	X	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
SO <sub>2</sub>	BAAQMD 9-1-302	Y		300 ppm (dry)		N		X	
SO <sub>2</sub>	40 CFR 60 Subpart KKKK 60.443(a)(2)	Y		0.060 lb/MMBtu	40 CFR 60 Subpart KKKK 60.4365(a)	P	Natural gas sulfur content certification	X	
SO <sub>2</sub>		Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measurements, calculations	X	
SO <sub>2</sub>	BAAQMD condition #23763, part 19g	Y		6.21 lb/hr, for turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
SO <sub>2</sub>	BAAQMD condition #23763, part 19g	Y		0.00128 lb/MM BTU, for turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
SO <sub>2</sub>	BAAQMD condition #23763, part 22f	Y		292 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
SO <sub>2</sub>	BAAQMD condition #23763, part 23e	Y		12.2 ton/yr for turbines, HRSGs, and diesel fire pump combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 9 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		≥ Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	SIP 6-301	Y		≥ Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		X	
FP	SIP 6-310	Y		0.15 grain/dscf		N		X	
FP	BAAQMD 6-1-310.3	N		0.15 grain/dscf @ 6% O <sub>2</sub>		N		X	
	SIP 6-310.3	Y		0.15 grain/dscf @ 6% O <sub>2</sub>		N		X	
PM <sub>10</sub>	BAAQMD condition #23763, part 19h	Y		7.5 lb/hr, for each turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
PM <sub>10</sub>	BAAQMD condition #23763, part 19h	Y		0.0036 lb/MMBTU, for each turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
PM <sub>10</sub>	Federal PSD Permit condition #26117, part 19h	Y		7.5 lb/hr, for each turbine and HRSG combined	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	
PM <sub>10</sub>	Federal PSD Permit condition #26117, part 19h	Y		0.0036 lb/MMBTU, for each turbine and HRSG combined	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	
PM <sub>10</sub>	BAAQMD condition #23763, part 22e	Y		413 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
PM <sub>10</sub>	Federal PSD Permit condition #26117, part 22e	Y		413 lb/day for turbines, HRSGs, and fire pump diesel engine combined	Federal PSD Permit condition #26117, part 27	P/D	Records, calculations	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 10 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
PM <sub>10</sub>	BAAQMD condition #23763, part 23d	Y		71.8 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
PM <sub>10</sub>	Federal PSD Permit condition #26117, part 23d	Y		71.8 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	Federal PSD Permit condition #26117, part 27	P/D	Records, calculations	X	
POC	BAAQMD condition #23763, part 19f	Y		2.86 lb/hr (as CH <sub>4</sub> ) for each turbine and HRSG combined except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
POC	BAAQMD condition #23763, part 19f	Y		0.00128 lb/MM BTU (as CH <sub>4</sub> ) for each turbine, and HRSG combined except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
POC	BAAQMD condition #23763, part 20	Y		35.3 lb/turbine during hot start-up	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
POC	BAAQMD condition #23763, part 20	Y		79 lb/turbine during warm start-up	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
POC	BAAQMD condition #23763, part 20	Y		16 lb/turbine during shutdown	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
POC	BAAQMD condition #23763, part 20	Y		83 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 11 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
POC	BAAQMD condition #23763, part 22d	Y		295 lb/day (as CH <sub>4</sub> ) for turbines and HRSGs combined	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
POC	BAAQMD condition #23763, part 23c	Y		28.5 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	
NH <sub>3</sub>	BAAQMD condition #23763, Part 19e	N		5 ppmv, dry, @ 15% O <sub>2</sub> , averaged over 3 hrs for each turbine and HRSG combined except during turbine startup or shutdown	BAAQMD condition #23763, part 26c, part 29	C	Ammonia injection rate monitor, calculations, and annual source test	X	
Formaldehyde	BAAQMD condition #23763, part 25	N		10,912 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records, calculations	X	
Formaldehyde	BAAQMD condition #23763, part 25	N		10,912 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	X	
Benzene	BAAQMD condition #23763, part 25	N		226 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records, calculations	X	
Benzene	BAAQMD condition #23763, part 25	N		226 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	X	
Specified PAHs	BAAQMD condition #23763, part 25	N		1.8 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records, calculations	X	
Specified PAHs	BAAQMD condition #23763, part 25	N		1.8 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 12 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Heat Input limit	BAAQMD condition #23763, part 13	Y		2,238.6 MM BTU/hour, 3-hr average for each Turbine and HRSG, total	BAAQMD condition #23763, part 26a	C	Fuel meter, calculations	X	
Heat Input limit	Federal PSD Permit condition #26117, part 13	Y		2,238.6 MM BTU/hour, 3-hr average for each Turbine and HRSG, total	Federal PSD Permit condition #26117, part 26a	C	Fuel meter, calculations	X	
Heat Input Limit	BAAQMD condition #23763, part 14	Y		53,726 MM BTU/calendar day, for each Turbine and HRSG, total	BAAQMD condition #23763, part 26a	C	fuel meter, calculations	X	
Heat Input Limit	Federal PSD Permit condition #26117, part 14	Y		53,726 MM BTU/calendar day, for each Turbine and HRSG, total	Federal PSD Permit condition #26117, part 26a	C	fuel meter, calculations	X	
Heat Input Limit	BAAQMD condition #23763, part 15	Y		35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined	BAAQMD condition #23763, part 26a	C	fuel meter, calculations	X	
Heat Input Limit	Federal PSD Permit condition #26117, part 15	Y		35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined	Federal PSD Permit condition #26117, part 26a	C	fuel meter, calculations	X	
CO <sub>2</sub> E	Federal PSD Permit condition #26117, part 50	Y		242 metric tons per hour for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 15	P/M	Fuel meter, calculations	X	
CO <sub>2</sub> E	Federal PSD Permit condition #26117, part 51	Y		5,802 metric tons per day for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 54	P/M	Fuel meter, calculations	X	
CO <sub>2</sub> E	Federal PSD Permit condition #26117, part 52	Y		1,928,182 metric tons per year for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 54	P/M	Fuel meter, calculations	X	

# **Title V CEMS Semi-Annual Monitoring Report**

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 13 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Heat Rate Limit	Federal PSD Permit condition #26117, part 53	Y		7,730 BTU/KW-hr for each gas turbine	Federal PSD Permit condition #26117, part 55	P/A	Source Test	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 14 of 17

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-5, COOLING TOWER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Y	N
Opacity	BAAQMD 6-1-303.1	N		≥ Ringelmann No. 2 for no more than 3 minutes in any hour		N		X	
Opacity	SIP Regulation 6-303.1	Y		≥ Ringelmann 2.0 for 3 minutes in any hour		N		X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		X	
Total Dissolved Solids	BAAQMD Condition #23763, part 44	Y		6,200 ppmw (mg/l)	BAAQMD Condition #23763, part 44	P/D	Sample and test cooling tower water	X	
Total Dissolved Solids	Federal PSD Permit Condition #26117, part 44	Y		6,200 ppmw (mg/l)	Federal PSD Permit Condition #26117, part 44	P/D	Sample and test cooling tower water	X	

# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 15 of 17

**Table VII – C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-6, FIRE PUMP DIESEL ENGINE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Y	N
Opacity	BAAQMD 6-1-303.1	N		≥ Ringelmann No. 2 for no more than 3 minutes in any hour		N		X	
Opacity	SIP Regulation 6-303.1	Y		≥ Ringelmann 2.0 for 3 minutes in any hour		N		X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		X	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours	None	N	N/A	X	
SO <sub>2</sub>	BAAQMD 9-1-304	Y		Fuel Sulfur Limit 0.5%	BAAQMD Condition # 20498, Parts 5 and 8	P/E	Vendor Certification	X	
Reliability Related Hours	BAAQMD 9-8-330	N		50 hours	9-8-502	P/E	Totalizing meter, Record-keeping	X	
Hours for maintenance and testing	Title 17, California Code of Regulations section 93115.6(a) (4)	N		Not operate more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 – “Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems,” 2002 edition	93115.10(d)	P/E	Totalizing meter, Record-keeping	X	
Reliability-related activities	BAAQMD Condition #23763, part 46	N		50 hours per calendar year	BAAQMD Condition #23763, parts 48, 49	P/E	Totalizing meter, record-keeping	X	



# Title V CEMS Semi-Annual Monitoring Report

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 16 of 17

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Y	N
Reliability-related activities	Federal PSD Permit Condition #26117, part 46	N		50 hours per calendar year	Federal PSD Permit Condition #26117, parts 48, 49	P/E	Totalizing meter, record-keeping	X	
CO <sub>2</sub> E	Federal PSD Permit Condition #26117, part 56	Y		7.6 metric tons per rolling 12-month period	Federal PSD Permit Condition #26117, part 58	P/E	Totalizing meter, record-keeping	X	

**Title V CEMS Semi-Annual Monitoring Report**

**Facility Name:** Russell City Energy Company, LLC.  
**Reporting Period:** January 1, 2018 to June 30, 2018

**Facility #:** B8136  
**Page:** 17 of 17

**Table VII – D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-7, S-8, S-9, S-10, & S-11 CIRCUIT BREAKERS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Y	N
CO <sub>2</sub> E	Federal PSD Permit Condition #26117, part 59	Y		39.3 metric tons per rolling 12- month period from S-7 through S-11, combined	Federal PSD Permit Condition #26117, part 60	P	Record-keeping, calculations	X	